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May 16, 2011

VIA ELECTRONIC MAIL (LETTER ONLY)
ENCLOSURES VIA HAND DELIVERY ON 5/17/11

Ms. Donzetta Thomas
Senior Assistant Regional Counsel
U.S. EPA, Region III
1650 Arch Street
Mailcode (3RC50)
Philadelphia, PA 19107

RE: Arsenal Associates LP
Dkt. No.: CAA-3-2011-0143DA

Dear Ms. Thomas:

I am writing to provide you with the status of documents and information requested under Paragraph 60 of the Administrative Compliance Order. The most important documents have already been produced to you in our Work Plan. See, e.g., Exhibits W, X, Y and Z. The vast majority of the remaining documents have been included in our rolling productions to the United States Attorney's Office in response to its request. I had assumed, perhaps incorrectly, that the AUSA was sharing these document productions with you. If not, I apologize and we are submitting herewith nine (9) disks containing documents Bates labeled as ARSENAL0000001 to ARSENAL0078261 which include the documents and information requested in Paragraph 60, as more fully explained below.

- 60A. Any prior surveys conducted by Langan Engineering and Environmental Services, Inc., Accredited Environmental Technologies, Inc., or other asbestos professionals

Response: We actually received the AET document from you within the last ten (10) days. To the best of our knowledge, the remaining documents are included on the disks.

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- 60B. Demolition contract(s) with Haines and Kibblehouse for the Facility.
Response: This document is included on the disks. An additional hard copy is included herewith.
- 60C. Any and all contracts with environmental contractor(s) relating to asbestos projects at the Facility.
Response: Responsive documents were included as Exhibits W, X, and Z to the Work Plan submitted April 27, 2011. We are continuing to gather additional responsive documents and will supplement our production, as needed.
- 60D. A property map documenting all steam tunnels located at the Facility.
Response: This document was included as Exhibit Y to the Work Plan submitted April 27, 2011.
- 60E. Any asbestos sampling results including, but not limited to, wipe samples, vacuum samples, bulk samples, and air samples from any building, basement, or steam tunnel at the Facility.
Response: To the extent such documents exist, they are included on the disks.
- 60F. Bid documents and/or proposals for asbestos projects at the Facility.
Response: These documents were included as Exhibits U and AA to the Work Plan submitted April 27, 2011. We are continuing to gather additional responsive documents and will supplement our production, as needed.
- 60G. Asbestos waste manifests relevant to the Facility.
Response: These documents are included on the disks. We are continuing to look for more, and will produce them immediately upon location.
- 60H. Any and all reports prepared for the Facility by asbestos or other environmental experts, including any reports generated by the United States Army.
Response: To the best of our knowledge, these documents are included on the disks.

Please contact me should you have any questions.

Very truly yours,


DAVID L. BRAVERMAN

Enclosures

cc: Ms. Christine Convery, EPA
Jeff Forester, Air Management Services
Michelle S. Walker, Esquire